

EXHIBIT “1”



LEIBEL LAW
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April 14, 2023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Tracking No.: 9402 7112 0620 7779 5292 28

Bed Bath and Beyond
1545 Market Place Boulevard
Cumming, GA 30041

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Tracking No.: 9402 7112 0620 7779 5230 80

CT Corporation System
Registered Agent
Bed Bath & Beyond Inc.
289 South Culver Street
Lawrenceville, GA 30046

RE: Our Client: Laura Alevy
Incident Location: 1545 Market Place Boulevard, Cumming, GA 30041
Incident Date: April 3, 2023

Dear Sir or Madam:

Please be advised that this office represents Laura Alevy with regard to the injuries she sustained from an incident which occurred on April 3, 2023, at Bed Bath and Beyond located at 1545 Market Place Boulevard, Cumming, GA 30041.

Pursuant to O.C.G.A. § 33-3-28, amended, you are requested to provide, within sixty (60) days from receipt of this letter, a statement, under oath, of a corporate officer or the insurer's claims manager providing a copy of the declaration page of any policy that covers injuries sustained on your property. You are requested to amend any information provided upon the discovery of facts inconsistent with or in addition to the information provided.

If our client has given a recorded statement, please forward a copy of the transcript of that statement to my office immediately. Please produce all photos you have relative to the incident. This

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letter serves as formal notice to you that any authorization for medical records previously authorized by our client is not to be used in obtaining medical records and is hereby revoked.

This letter is also to formally demand preservation of certain evidence relevant to this incident. If you fail to properly secure and preserve those important pieces of evidence, it will give rise to a legal presumption that the evidence would have been harmful to your side of the case. The destruction, alteration, or loss of any of the relevant evidence, may constitute spoliation under applicable law. If you fail to preserve and maintain this evidence, we will seek sanctions available under law. We specifically request that the following evidence be maintained and preserved and not be destroyed, modified, altered, repaired, or changed in any manner regarding the premises of Bed Bath and Beyond and this incident:

1. Any audio and video surveillance footage from April 3, 2023, to include all cameras both outside and inside of the building located at 1545 Market Place Boulevard, Cumming, GA 30041.
2. Any internal reports written, including any types of notes or documentation, about the incident on April 3, 2023, from any staff member at Bed Bath and Beyond located at 1545 Market Place Boulevard, Cumming, GA 30041.
3. Any audio and video recordings involving anyone speaking with my client about this incident on April 3, 2023.
4. Any documentation, including receipts or other paperwork, in your possession in reference to any structural repairs, additions, or renovations you have had completed on the property located at 1545 Market Place Boulevard, Cumming, GA 30041.
5. Any still photography depicting images of the interior of the property located at 1545 Market Place Boulevard, Cumming, GA 30041.

Thank you in advance for our prompt response to this request. If you have any questions, please feel free to contact me at (404) 892-0700. You may fax the certificate of coverage to my attention at (770) 844-0015.

Best regards,

STEVEN LEIBEL, P.C.



Steven Leibel

SKL/klp

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